



March 3, 2016

Ms. Barbara Richardson
Insurance Commissioner
Nevada Division of Insurance
1818 East College Parkway
Suite 103
Carson City, NV 89706

Dear Commissioner Richardson:

On behalf of the Nevada Psychiatric Association (NPA), I would like to welcome you to Nevada. We look forward to working with you on health care insurance issues.

We would also like to express our appreciation for the hard work done by your staff in the development of the network adequacy regulations and we appreciate the opportunity to provide these comments regarding the most recent draft of R049-14 (dated October 19, 2015 – Updated by DOI 2 March 2016)).

The proposed regulations establish adequacy of network requirements for individual and small employer group plans and impact nearly 216,500 covered lives as of March 31, 2015 (most recent data available from DOI). These comments are in addition to those previously submitted.

NPA encourages the Division to require health insurance carriers to report (on a quarterly or semi-annual basis) the number of in-network and out-of-network claims paid to each physician specialty. These reports, which should be published, will help in understanding whether the networks are adequate because: (a) if the out-of-network claims are disproportionate to the in-network claims paid, it would indicate that the network itself is not sufficient; and (b) if the number of out of network claims for mental health are disproportionate to the non-mental health claims filed, it would trigger investigation into why mental health treatment is provided on a less favorable basis under the plan. These types of reports are important and reasonable monitoring tools for the understanding and oversight of network adequacy.

Thank-you for your time in considering the NPA's recommendations. If you have any questions or need additional information, please do not hesitate to contact me or Jeanette Belz at jb@jkbeltz.com or 775-329-0119. Jeanette is our government relations representative.

NPA looks forward to working with you as these regulations work their way through the approval process.

Sincerely,

A handwritten signature in cursive script, reading "Lesley R. Dickson" followed by a stylized flourish.

Lesley R. Dickson, MD
Executive Director and State Legislative Representative
Nevada Psychiatric Association
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